



Child and Community Services Division **Policy & Procedures**



Subject: Address Confidentiality Program
Process Owner: Child and Community Services Division
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Address Confidentiality Program Procedure

I. PURPOSE

The purpose of this Procedure is to implement the requirements set by DES 1-01-45 as applicable to Employees, Contractors, and Clients of the Child and Community Services Division (CCSD) at DES.

This Procedure is not a substitute for reading, understanding, and complying with DES 1-01-45 and State law.

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III. APPLICABILITY

This Procedure applies to all CCSD Employees, Contractors, and Clients.

IV. AUTHORITY

[A.R.S. Title 41, Chapter 1,
Article 3](#)

Address Confidentiality Program

[DES-1-01-45](#)

DES Address Confidentiality Program

V. DEFINITIONS

ACP Authorization Card: A document issued by AZSOS that identifies the cardholder as an ACP Participant. The card contains the ACP Substitute Address, as well as the effective and expiration dates of ACP participation.

ACP Coordinator: The Employee designated by the DES Director to provide technical assistance regarding ACP to other Employees and Contractors, monitor DES compliance with ACP requirements, and investigate suspected ACP violations within DES.

ACP Participant: An individual who has been accepted into the AZSOS program established pursuant to A.R.S. Title 41, Chapter 1, Article 3 to protect the confidentiality of the Actual Address of a relocated victim of domestic violence, a sexual offense, or stalking.

Actual Address: As defined in A.R.S. § 41-161, an individual's residential, work, or

school address specified on the individual's application to be an ACP Participant, including the county and voting precinct number.

Address Confidentiality Program (ACP): The program administered by AZSOS that provides individuals who are survivors of domestic violence offenses, sexual offenses, or stalking with a Substitute Address to use as their address of record, keeping the individual's actual residential, work, and school addresses confidential.

Arizona Secretary of State (AZSOS): The elected official who, amongst other duties, oversees and administers functions including elections, business services, the Arizona State Library, Archives and public records, and ACP in Arizona.

Client: An applicant for or a recipient of CCSD benefits or services.

Contractor: Any individual or entity who conducts business for or on behalf of CCSD under a contract for services, is not issued an Employee Identification Number, and who is not directly employed by or with the State of Arizona to provide services to CCSD.

Child and Community Services Division (CCSD): The area within DES, regardless of the current or future name, responsible for compliance with ACP laws, policies, and procedures for all assigned programs and administrative functions.

Division: A programmatic, functional, operational, or administrative area or section of DES that reports to an Assistant Director or, in the absence of an Assistant Director, directly to a Deputy Director or the equivalent, or the Director, and for whom the Director has ultimate responsibility.

Division ACP Liaison: The CCSD Employee, designated by the Division Assistant Director, who coordinates ACP activity for the Division.

Employee: Any individual who is directly employed temporarily or permanently by or with the State of Arizona to conduct CCSD business on a full-time or part-time basis, regardless of whether the individual is paid. This term does not apply to employees of the State of Arizona who work for other state agencies that assist CCSD.

Management: An executive leader within CCSD that may include a Deputy Director, Assistant Director, Deputy Assistant Director, Policy Administrator, or Program Administrator.

Record: Any email, electronic chat message, text message, book, paper, map, photograph, electronic document, physical document, or other material that documents DES activity, regardless of physical form or characteristics, including those made confidential by statute. Records are NOT:

- Library or museum materials made or acquired solely for reference or exhibition

purposes;

- Extra copies of documents preserved only for convenience of reference; or
- Stocks of publications or documents intended for sale or distribution to the public.

Redact: The process of editing a Record to mask an ACP Participant's Actual Address.

Substitute Address: As defined in A.R.S. § 41-161, the address designated by the AZSOS under the ACP for an ACP Participant to use instead of the ACP Participant's Actual Address.

VI. STANDARDS

A. General Standards

1. The governing policy and procedures for all ACP activities at the Arizona Department of Economic Security (DES) is DES 1-01-45.
2. This Procedure effectuates the requirements set forth in DES 1-01-45 as applicable to CCSD and its programs.
3. All previously published ACP policies or procedures specific to CCSD and its programs are rescinded upon the effective date of this Procedure.

VII. PROCEDURES

A. Notification and Verification of ACP Participation

1. A Client who is an ACP Participant and who wishes to use the Client's Substitute Address for a CCSD program or service shall:
 - a. Notify an Employee or Contractor that the Client is an ACP Participant by:
 - i. Responding 'Yes' to the ACP question on an application and using the Client's Substitute Address as the address of record; or
 - ii. Directly informing an Employee or Contractor verbally or in writing that the Client is an ACP Participant; and
 - b. Provide the Client's ACP Authorization Card.
2. An Employee or Contractor who is notified that a Client is an ACP Participant shall immediately attempt to verify ACP participation by doing all of the following:

- a. Viewing the Client's ACP Authorization Card (front and back);
 - b. Contacting the AZSOS Address Confidentiality Program by phone at (602) 542-1892 and providing the following information:
 - i. Client's First and Last name;
 - ii. Client's ACP apartment number; and
 - c. Documenting the AZSOS contact in the Client file.
3. Additionally, an Employee or Contractor shall contact the AZSOS Address Confidentiality Program for verification, and document the contact in the Client file, in these situations:
- a. The Client is unable to provide their ACP Authorization Card;
 - b. The Client presents documentation other than an ACP Authorization Card to verify ACP participation;
 - c. A Client's ACP Authorization Card appears altered or fraudulent; or
 - d. The Client's ACP Authorization Card is expired according to the date listed on the card.
4. Upon verifying a Client's ACP participation, an Employee or Contractor shall immediately:
- a. Add a case note in the Client file with the Client's ACP apartment number and the issue/expiration date of the ACP Authorization Card;
 - b. Add a system indicator in the electronic subsystem(s) relevant to the program, if a system indicator is available. Examples of electronic subsystems used by CCSD or its Contractors, which may or may not have system indicators available, include, and are not limited to:
 - AZTECS
 - AZCCATS
 - FAMS / CaseXcellence
 - OnBase
 - Salesforce

- A-to-Z Arizona
 - HMIS
 - Link2Feed
 - AZ360
 - ITEAMS
 - CAP60
- c. If a copy of the ACP Authorization Card was provided, securely store the document in the Client's file;
- d. Use the Client's Substitute Address in new Records;
- e. For all Records that were created within 90 calendar days of the date of issuance on the ACP Authorization Card, and only at the request of the Client:
- i. Redact the Client's Actual Address; or
 - ii. Replace the Actual Address with the Substitute Address.
- f. Contractors of the Arizona Early Intervention Program (AzEIP) shall also notify the designated AzEIP program representative upon verification of a Client's ACP participation.
5. An Employee or Contractor who is unable to verify a Client is an ACP Participant, or who receives confirmation that a Client's ACP participation has expired, shall:
- a. Immediately inform the Client that ACP participation could not be verified;
 - b. Inform the Client that CCSD will use the Client's Actual Address; and
 - c. If the Client requests withdrawal of the application from CCSD Records, immediately notify the Division ACP Liaison by emailing ccsdpolicy@azdes.gov.
6. If the Division ACP Liaison is notified of a Client's request to withdraw the Client's application from CCSD Records due to inability to verify that the

Client is an ACP Participant, the Division ACP Liaison shall immediately notify the ACP Coordinator.

7. If a Client states that the Client or another individual wishes to enroll in ACP, an Employee or Contractor shall:
 - a. Inform the Client that DES does not administer ACP; and
 - b. Refer the Client to the [AZSOS Address Confidentiality Program](#).

B. Requests for ACP Participant Actual Address

Under Arizona law, state and local government entities are authorized to request an ACP Participant's Actual Address only when there is a statutory or administrative need. Statutory or administrative need is assessed on a case-by-case basis by the AZSOS Address Confidentiality Program.

Examples of statutory or administrative need in CCSD could include determining applicant eligibility for a program with residence-specific eligibility criteria, or conducting administrative review on a case when the Actual Address is necessary to determine the validity of the claim. Statutory or administrative need connected to a public records request, subpoena, or law enforcement investigation will be managed in coordination with other DES offices or other Arizona state agencies.

1. An Employee or Contractor who has a statutory or administrative need for an ACP Participant's Actual Address shall, when possible, ask the ACP Participant for the Actual Address.
2. If an ACP Participant voluntarily discloses the Actual Address to an Employee or Contractor, the Employee or Contractor shall:
 - a. Only use the Actual Address for the purpose(s) described to the ACP Participant when permission was granted; and
 - b. Not retain any Record of the Actual Address unless:
 - i. The ACP Participant grants verbal or written permission to do so; and
 - ii. The Employee or Contractor clearly documents this permission in the Client file.
3. **Employee Request for Actual Address.** If an Employee is unable to obtain the Actual Address from the ACP Participant, the Employee shall:
 - a. Complete a Standard Address Disclosure Request ([DES-1070A](#)); and

Liaison shall:

- a. If the request is approved:
 - i. Immediately provide the requesting Employee with the AZSOS disclosure document via secure email message. The disclosure document will include the following information:
 - The Client's Actual Address; and
 - The time frame CCSD is authorized to use the Actual Address (i.e., the permitted use period).
 - ii. The secure email message must be sent using Virtru or another State-approved encrypted data security platform with these settings enabled:
 - Disable Forwarding - renders the message unreadable if forwarded.
 - Expiration Date - disables access to the message after the permitted use period expires.
 - Persistent Protection - secures the disclosure document in a read-only format that cannot be downloaded and that only the recipient can view.
 - b. If the request is denied, inform the requesting Employee via email, including the instruction to continue to use the Substitute Address; and
 - i. Inform the ACP Coordinator of the outcome of the request via email to acpquestions@azdes.gov.
6. When an Employee receives an AZSOS disclosure document pursuant to an approved request for Actual Address, the Employee shall:
- a. Notify the Employee's supervisor for awareness; and
 - b. Only access the disclosure document via secure email message.
7. An Employee shall not:
- a. Print the AZSOS disclosure document;
 - b. Save the disclosure document to a shared drive or network;
 - c. Download the disclosure document locally to the Employee's computer;

- d. Send the disclosure document to any other Employee or Contractor, unless authorized to do so as part of the original request; or
 - e. Disclose an ACP Participant's Actual Address to the ACP Coordinator unless the AZSOS disclosure allows access to the ACP Coordinator.
8. **Contractor Request for Actual Address.** A Contractor who has a statutory or administrative need for an ACP Participant's Actual Address shall submit a request directly to the AZSOS Address Confidentiality Program in accordance with the Contractor's policies and procedures.
- a. A Contractor shall provide the Contractor's ACP policies and procedures to the Contractor's CCSD program representative and the Division ACP Liaison for review, upon request.

C. **Appealing AZSOS Denial of an Actual Address**

- 1. **Employee Appeals.** An Employee whose request for an ACP Participant's Actual Address was denied by the AZSOS Address Confidentiality Program may, within three (3) business days of the denial, email the Division ACP Liaison at ccsdpolicy@azdes.gov to request that the Division ACP Liaison appeal the decision on behalf of the Employee.
- 2. Upon receipt of a request for appeal, the Division ACP Liaison shall, within fifteen (15) business days of the denial of request for Actual Address:
 - a. Confirm with the submitting Employee that a statutory or administrative need for the Actual Address still exists; and
 - b. Coordinate with the ACP Coordinator to determine whether an appeal is appropriate.
- 3. If the ACP Coordinator and Division ACP Liaison determine an appeal is appropriate, the Division ACP Liaison shall:
 - a. File an appeal by sending an email to the AZSOS Address Confidentiality Program at acpinfo@azsos.gov and the ACP Coordinator at acpquestions@azdes.gov that includes:
 - i. A copy of the original DES-1070A form; and
 - ii. A summary of reasons the denial may require review.
- 4. **Contractor Appeals.** A Contractor whose request for an ACP Participant's Actual Address was denied by the AZSOS Address Confidentiality Program

may appeal the decision directly with the AZSOS Address Confidentiality Program in accordance with the Contractor's policies and procedures.

D. Maintaining an Actual Address

1. When an Actual Address is provided to an Employee pursuant to an AZSOS disclosure notice, the Division ACP Liaison shall:
 - a. Maintain a written, confidential Record of the permitted use period assigned by the AZSOS for each Actual Address disclosed to an Employee;
 - b. On the date the permitted use period ends, provide, via email, all Employees to whom an Actual Address has been disclosed:
 - i. Notice that the permitted use period for the Actual Address has ended;
 - ii. Information regarding the requirement to cease using the Actual Address and remove the Actual Address from all Records; and
 - iii. Request confirmation from the Employee(s) of the following:
 - The Actual Address has been removed from all Records on the date the permitted use period ends; and
 - The AZSOS disclosure document has been disposed of.
2. An Employee shall respond via email to the request from the Division ACP Liaison within three (3) business days of receipt to confirm the Actual Address has been removed from all Records on the date the permitted use period ends, including that the AZSOS disclosure document has been disposed of.
3. To request permission to disclose the Actual Address or telephone number of an ACP Participant as permitted by law, an Employee shall send an email to the ACP Coordinator at acpquestions@azdes.gov that includes:
 - a. A copy of the request or subpoena, as applicable;
 - b. The purpose for which the Employee proposes to disclose the Actual Address;
 - c. The entity to whom the Employee proposes to disclose the Actual

Address; and

- d. The legal citation that the Employee believes permits the Actual Address to be disclosed.
4. A Contractor who receives an Actual Address from the AZSOS Address Confidentiality Program shall maintain the Actual Address according to the conditions and limitations specified in the AZSOS disclosure notice, and the Contractor's policies and procedures.

E. Terminating ACP Participation in Division Records

1. An Employee or Contractor shall continue to protect Records of a verified ACP Participant until:
 - a. The ACP Participant requests that the Division cease providing ACP protection. The request to terminate ACP protection must be received only from the ACP Participant, or from the ACP Participant's parent or guardian when the ACP Participant is a minor or incapacitated adult; or
 - b. Mail sent to the ACP Participant at the Participant's Substitute Address is returned to CCSD as undeliverable.
2. An Employee or Contractor who receives returned mail from a Client's Substitute Address or otherwise suspects a Client is no longer an ACP Participant shall:
 - a. Contact the Client to confirm the Client's ACP status; or
 - b. Contact the AZSOS ACP Office to confirm the Client's ACP status.
3. If a Client is confirmed to no longer be an ACP participant, the Employee or Contractor shall:
 - a. Inform the Client that the Client's Actual Address will be used in Records created after the date the Client's ACP participation ended;
 - b. Notify the Division ACP Liaison of the termination of the Client's ACP participation;
 - c. Make a case note indicating the date of the termination of the Client's ACP participation; and

- d. Use the Client's Actual Address in Records created after the date the Client's ACP participation ended.

F. Technical Assistance and Training

1. An Employee or Contractor shall direct questions and requests for assistance regarding ACP via email to the Division ACP Liaison at ccsdpolicy@azdes.gov.
 - a. Contractors shall include the Contractor's CCSD program representative in email communications to the Division ACP Liaison.
2. The Division ACP Liaison shall:
 - a. Regularly monitor the ccsdpolicy@azdes.gov inbox for ACP inquiries; and
 - b. Respond to incoming messages within two (2) business days.
3. The Division ACP Liaison shall provide training on this Procedure to CCSD Employees and Contractors, as needed. This may include:
 - a. Informational bulletins distributed via email;
 - b. Desk aids and reference guides developed in coordination with the CCSD Training team; and
 - c. Training sessions hosted via video conference.
4. As required by DES 1-01-45, an Employee or Contractor shall complete the computer-based TraCorp training *Address Confidentiality Program* (DESACP15), or its equivalent on any future training platform, within 90 calendar days of becoming an Employee or Contractor and annually thereafter.
 - a. A Contractor shall provide a copy of the certificate of completion for any required ACP training to the Contractor's CCSD program representative.
 - i. The program representative shall maintain Contractor certificates according to CCSD monitoring procedures.

G. ACP Violations

1. An Employee or Contractor shall report suspected violations of this Policy, DES 1-01-45, and State law by:

- a. Completing sections of the Report of Address Confidentiality Program Violation ([DES-1363A](#)) and sending via a single email to:
 - i. The Division ACP Liaison at ccsdpolicy@azdes.gov; and
 - ii. The ACP Coordinator at acpquestions@azdes.gov.
2. An Employee, Contractor, or other individual reporting a suspected ACP violation shall include in the report:
 - a. A summary of the violation the individual believes occurred;
 - b. The individual alleged to have committed the violation, if known;
 - c. The date of the violation, if known; and
 - d. Any other information the individual making the report believes is applicable.
3. Upon receipt of a DES-1363A form, and during any subsequent investigation, the Division ACP Liaison shall:
 - a. Review the details of the suspected ACP violation; and
 - b. Provide any supporting documentation or information as requested by the ACP Coordinator or CCSD Management.
4. If the ACP Coordinator substantiates a suspected ACP violation and corrective action or technical assistance are approved, the Division ACP Liaison shall, at the direction of the ACP Coordinator or CCSD Management:
 - a. Assist the ACP Coordinator in developing or implementing corrective action or technical assistance; and
 - b. Revise this Procedure and any published supporting documentation, in accordance with DES 1-01-45 and CCSD policy development standards.